

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

HERITAGE HOME GROUP, LLC, *et al.*¹

Debtors.

Chapter 7

Case No. 18-11736 (BLS)

(Jointly Administered)

ALFRED T. GIULIANO, in his capacity as
Chapter 7 Trustee of HERITAGE HOME
GROUP, LLC, *et al.*,

Plaintiff,

vs.

BCL-ED NEWCO LLC,

Defendant.

Adv. Proc. No. 20-50710 (BLS)

**STIPULATION FURTHER EXTENDING DEADLINE FOR
DEFENDANT TO RESPOND TO THE COMPLAINT**

Plaintiff Alfred T. Giuliano, in his capacity as chapter 7 Trustee of Heritage Home Group, LLC, *et al.* (the “Plaintiff”) and Defendant BCL-ED Newco LLC. (the “Defendant”) in this adversary proceeding, by and through their respective counsel, hereby stipulate and agree as follows:

1. On July 16, 2020, the Plaintiff filed the Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550 (the “Complaint”) in the above captioned adversary proceeding against the Defendant.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s tax identification numbers, are: Heritage Home Group LLC (9506); HH Global II B.V. (0165); HH Group Holdings US, Inc. (7206); HHG Real Property LLC (3221); and HHG Global Designs LLC (1150). The Debtors’ corporate headquarters was located at 1925 Eastchester Drive, High Point, North Carolina 27265.

2. On August 12, 2020, the Parties filed a stipulation to further extend the time to answer the Complaint [Docket No. 5].

3. The deadline for the Defendant to answer, move or otherwise respond to the Complaint was scheduled for October 12, 2020.

4. The Plaintiff has agreed to give the Defendant an extension of approximately thirty (30) days so that the deadline for the Defendant to answer, move or otherwise respond to the Complaint shall be November 12, 2020.

5. This Stipulation is without prejudice to the rights of the parties to seek a further continuation of this deadline.

6. This Stipulation may be executed by facsimile and in any number of counterparts, each of which when so executed shall be deemed an original, but all such counterparts shall constitute but one and the same Stipulation.

Dated: October 9, 2020
Wilmington, Delaware

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